



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

November 5, 2019

**BY ECF**

Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Turkiye Halk Bankasi A.S.,  
S6 15 Cr. 867 (RMB)**

Dear Judge Berman,

The Government respectfully submits this letter to provide additional information regarding its efforts to provide notice to the defendant, Turkiye Halk Bankasi A.S. ("Halkbank"), of the indictment and summonses in this matter. As noted in our letter dated yesterday, among other delivery efforts, the indictment, the summons dated October 23, 2019, and the Court's October 23, 2019 order were sent for delivery by FedEx to Halkbank's Legal Department at its headquarters address. The Government was advised by FedEx that delivery was refused.

Today, we received additional information from FedEx regarding the delivery refusal (attached as Exhibit A). According to FedEx, its Turkey office received a handwritten communication in both Turkish and English apparently signed by a member of Halkbank's legal department. The English communication reads:

Please be informed that this package . . . sent by the U.S. Attorney's Office for the Southern District of New York was [ill.] and not accepted by this Bank, since the form of delivery is not in compliance with the legal service provisions of bilateral treaties between the Turkish Republic and the U.S.

For this reason, and those set forth in yesterday's letter, it is clear that Halkbank is aware of the Indictment and the Court's summonses and is attempting to evade service. Notwithstanding those efforts, service of the indictment and summonses has been effected consistent with Rule 4

of the Federal Rules of Criminal Procedure and Halkbank is required to appear in this matter to answer the charges against it.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

by:                     /s/                      
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cc: Counsel of Record (by ECF)  
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